

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALBERT GRAY, Administrator, et al

VS.

JEFFREY DERDERIAN, et al

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C.A. NO. 04-312L

ANSWER OF DEFENDANT, JBL, INCORPORATED
f/k/a JAMES B. LANSING SOUND, INCORPORATED d/b/a JBL PROFESSIONAL

FIRST DEFENSE

AS TO PARTIES

PLAINTIFFS

This defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs 1 through 226 of the plaintiffs' complaint and leaves the plaintiffs to their proof.

AS TO GENERAL ALLEGATIONS AS TO ALL DEFENDANTS

This defendant denies the allegations contained in paragraph 271 of the plaintiffs' complaint.

AS TO JEFFREY DERDERIAN

This defendant makes no answer to paragraphs 272 through 283, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO MICHAEL DERDERIAN

This defendant makes no answer to paragraphs 284 through 290, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO DERCO, LLC

This defendant makes no answer to paragraphs 291 through 297, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

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AS TO HOWARD JULIAN

This defendant makes no answer to paragraphs 298 through 303, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO TRITON REALTY LIMITED PARTNERSHIP

This defendant makes no answer to paragraphs 304 through 311, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

TRITON REALTY, INC.

This defendant makes no answer to paragraphs 312 through 319, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO RAYMOND J. VILLANOVA

This defendant makes no answer to paragraphs 320 through 327, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO JACK RUSSELL

This defendant makes no answer to paragraphs 328 through 334, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO JACK RUSSELL TOURING, INC.

This defendant makes no answer to paragraphs 335 through 343, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO PAUL WOOLNOUGH

This defendant makes no answer to paragraphs 344 through 351, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO MANIC MUSIC MANAGEMENT, INC.

This defendant makes no answer to paragraphs 352 through 359, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

KNIGHT RECORDS, INC.

This defendant makes no answer to paragraphs 360 through 367, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO DANIEL BIECHELE

This defendant makes no answer to paragraphs 368 through 375, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO ANHEUSER-BUSCH, INCORPORATED AND
ANHEUSER-BUSCH COMPANIES, INCORPORATED

This defendant makes no answer to paragraphs 376 through 386, the same not applying to these defendants, but in so far as the same may apply all allegations therein are specifically denied.

AS TO MCLAUGHLIN & MORAN, INC.

This defendant makes no answer to paragraphs 387 through 394, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO WHJY, INC.

This defendant makes no answer to paragraphs 395 through 403, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO CLEAR CHANNEL BROADCASTING, INC.

This defendant makes no answer to paragraphs 404 through 409, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO DENIS P. LAROCQUE, ANTHONY BETTENCOURT AND
DIANE DERUOSI, IN HER CAPACITY AS TREASURER OF THE
TOWN OF WEST WARWICK

This defendant makes no answer to paragraphs 410 through 432, the same not applying to these defendants, but in so far as the same may apply all allegations therein are specifically denied.

AS TO THE STATE OF RHODE ISLAND AND
IRVING J. OWENS, FIRE MARSHAL

This defendant makes no answer to paragraphs 433 through 439, the same not applying to these defendants, but in so far as the same may apply all allegations therein are specifically denied.

AS TO BRIAN BUTLER

This defendant makes no answer to paragraphs 440 through 445, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO LIN TELEVISION CORPORATION

This defendant makes no answer to paragraphs 446 through 451, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO CBS BROADCASTING, INC.

This defendant makes no answer to paragraphs 452 through 457, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO BARRY H. WARNER

This defendant makes no answer to paragraphs 458 through 467, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO LUNA TECH, INC.

This defendant makes no answer to paragraphs 468 through 476, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO HIGH TECH SPECIAL EFFECTS, INC.

This defendant makes no answer to paragraphs 477 through 485, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO AMERICAN FORM CORPORATION

This defendant makes no answer to paragraphs 486 through 496, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO LEGGGETT & PLATT, INCORPORATED

This defendant makes no answer to paragraphs 497 through 506, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO L&P FINANCIAL SERVICES CO.

This defendant makes no answer to paragraphs 507 through 515, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO GENERAL FOAM CORPORATION

This defendant makes no answer to paragraphs 516 through 524, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO GFC FOAM, LLC

This defendant makes no answer to paragraphs 525 through 534, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO FOAMEX LP, FOAMEX INTERNATIONAL, INC.,
FMXI, INC., PMC, INC. AND PMC GLOBAL, INC.

This defendant makes no answer to paragraphs 535 through 555, the same not applying to these defendants, but in so far as the same may apply all allegations therein are specifically denied.

AS TO JBL INCORPORATED f/k/a JAMES B. LANSING SOUND,
INCORPORATED d/b/a JBL PROFESSIONAL

1. This defendant admits that JBL Incorporated, formerly known as James B. Lansing Sound, Incorporated d/b/a JBL Professional is a foreign corporation organized and existing under the laws of the State of Delaware and is without knowledge or information sufficient to form a belief as to the remainder of the allegations contained in paragraph 556 until the product, allegedly manufactured by this defendant is identified.

2. This defendant is without knowledge or information as to the truth of the allegations contained in paragraph 557 until the product allegedly manufactured by this defendant is identified.

3. This defendant denies the allegations contained in paragraphs 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568 and 569.

AS TO ESSEX INSURANCE COMPANY, MULTI-STATE INSPECTIONS, INC.,
HIGH CALIBER INSPECTIONS, INC., UNDERWRITERS AT LLOYD'S LONDON
AND GRESHAM & ASSOCIATES OF R.I., INC.

This defendant makes no answer to paragraphs 570 through 591, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO FOUR SEASONS COACH LEASING, INC.

This defendant makes no answer to paragraphs 592 through 599, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

AS TO COUNTS LXIII AND LXIV

1. This defendant makes no answer to paragraphs 600 through 610, the same not applying to this defendant, but in so far as the same may apply all allegations therein are specifically denied.

2. This defendant denies all other allegations contained in the plaintiffs' complaint.

SECOND DEFENSE

The plaintiffs, and each of them, were guilty of conduct which caused or contributed to the injuries and/or damages complained of.

THIRD DEFENSE

The plaintiffs injuries and/or damages, if any at all, were caused by other persons, firms or corporations for whose conduct this defendant is not responsible.

FOURTH DEFENSE

The plaintiffs, and each of them, were guilty of conduct which caused or contributed to the injuries and/or damages complained of.

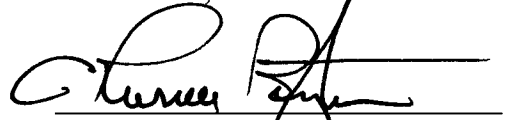
FIFTH DEFENSE

This defendant affirmatively pleads lack of personal and/or subject matter jurisdiction as a bar to the within action.

SIXTH DEFENSE

This defendant affirmatively pleads that the product, if manufactured and/or supplied by this defendant, was used in a manner which was unforeseen; used in a manner which was not intended; was altered and/or modified; and therefore, this action is barred.

CARROLL, KELLY & MURPHY



C. RUSSELL BENGTSON #1233
One Turks Head Place, Suite 400
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(401) 331-7272

Defendant, JBL, Incorporated f/k/a James B. Lansing Sound, Incorporated
d/b/a JBL Professional hereby claims trial by jury.

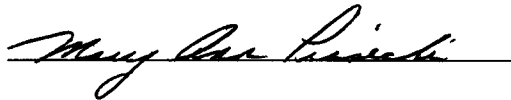
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CERTIFICATION

I hereby certify that a true copy of the within was mailed and/or hand delivered to the
counsel of records listed on the attached Service List on the 27th day of
August, 2004.



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